

**Addendum to the San Andreas Sanitary District Collection System Improvements Project Final  
Initial Study/Mitigated Negative Declaration (SCH No. 2018092063)**

**State Revolving Fund**

Prepared for:  
San Andreas Sanitary District

Prepared by:  
KSN, Inc.  
711 N. Pershing Avenue  
Stockton, CA 95203



March 2021

## **Introduction**

This document, prepared pursuant to the California Environmental Quality Act (CEQA), describes the additions to the San Andreas Sanitary District Collection System Improvements Project evaluated in September 2018 Final Initial Study/Mitigated Negative Declaration (Final IS/MND) and provides a determination that the addition to the project is within the scope of the Final IS/MND and no further environmental review is required.

The Final IS/MND evaluated the potential environmental impacts anticipated to result from the construction and operation of the project; the San Andreas Sanitary District (District) provides wastewater (i.e. sewage) collection, treatment, and disposal services to properties within District boundaries in the unincorporated community of San Andreas, California. The purpose of the project is to address identified capacity issues comprehensively within the Project limits, and correct deficiencies in age and hydraulic capacity of the sewers. Work includes upsizing sewer trunk segments adjacent to San Andreas Creek, improving maintenance hole (MH) geometry at MH E-1200, and upsizing sewers with recurring maintenance issues tributary to the trunk improvements.

The San Andreas Sanitary District is the Lead Agency for CEQA environmental review.

## **Addendum Requirements**

This addendum is prepared pursuant to CEQA Guidelines Section 15164(b) which states: "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred". Section 15162 specifies that "no subsequent EIR [or MND] shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Pursuant to CEQA Guidelines Section 15164, this Addendum summarizes the additions to the project evaluated in the Final IS/MND and the reasons for the District’s conclusion that changes to the project and associated environmental effects do not meet the conditions described in the CEQA Guidelines Section 15162 requiring preparing of a subsequent MND.

### **Updated Project Elements**

Since the adoption of the Final IS/MND and approval of the proposed project, the District has discovered that portions of the existing sanitary sewer lines, which require removal and replacement for upsizing, were constructed with asbestos cement piping; the presence of asbestos in the aforementioned piping was unknown at the time the Final IS/MND was composed. No other project elements are to be changed or added.

### **Updated Environmental Impact Analysis**

This section addresses the updates to the impact analysis in the IS/MND as a result of the project update described above. Checklist Topic 3 Air Quality and Checklist Topic 8 Hazards and Hazardous Materials, are reviewed and updated to incorporate any potential impacts to air quality and hazards/hazardous materials, and more specifically identify the code requirements and regulations that address the updated project element as discussed above.

#### **Air Quality**

##### ***Final IS/MND Analysis***

The proposed Project is located in the unincorporated community of San Andreas within the Mountain Counties Air Basin. Air basin quality issues in Calaveras County are primarily related to prevailing winds transporting pollutants from the San Francisco Bay Area and the Central Valley up against the western Sierra Foothills (Calaveras County 2016). According to the CARB, Calaveras County violates State PM10 standards; this can be attributed to the climate, topography, and the growing number of people, industries, businesses, and cars that collectively contribute to the formation of smog (CARB 2018a).

The CCAPCD is responsible for the management of air quality in Calaveras County. According to the CCAPCD, the pollutants of greatest concern are ozone and PM10.

##### **Ultramafic Rock, Serpentine or Naturally Occurring Asbestos Occurrence**

The Project is not directly located in an area mapped as having, or otherwise known to have, ultramafic rock, serpentine or naturally occurring asbestos. The nearest ultramafic mapping unit is approximately two miles to the west of the Project area (California Geologic Survey 2011). This area was known to be a

former asbestos mining prospect. The Statewide Asbestos Airborne Toxic Control Measures (ATCM) would not apply unless ultramafic rock/serpentine is discovered during grading or trenching. If ultramafic rock is discovered, the CCAPCD must be notified no later than the following business day and the ATCMs would apply.

### ***Updated Analysis***

Checklist topic 3 of the Final IS/MND analyzed impacts to air quality. The IS/MND identified temporary short-term, construction-related impacts to air quality. No long-term operational impacts were identified. All air quality impacts identified in the check list were either less than significant with mitigation or less than significant. Similar to the proposed project, the updated project element would not conflict with or obstruct implementation of the applicable air quality plan, violate air quality standards, or result in a cumulatively considerable net increase in any criteria pollutant.

The asbestos cement piping is currently in a non-friable form and is not anticipated to become friable during removal; the Contractor will follow all current state and federal laws pertaining to asbestos removal and disposal and therefore impacts will be less than significant with mitigation incorporated. Construction of the updated project element would utilize similar construction techniques identified in the Final IS/MND; while the Final IS/MND specified 'naturally occurring' asbestos, any potential impacts from the discovery of asbestos pipes would be substantially similar to those described in the Final document and would not warrant additional analysis. Further, the regulation for naturally occurring asbestos is the same regulation (CCR Title 17 Section 9305) that applies to asbestos pipe in which activities in compliance with the regulations would not require additional mitigation. Therefore, no additional impacts or increase in the severity of air quality impacts would occur with implementation of the updated project element. Implementation of Mitigation Measure AIR-1, identified in the Final IS/MND, would ensure that any impacts related to air quality would be reduced to less than significant levels. No new significant impacts would occur and no additional mitigation measures are required.

### ***Mitigation Measures***

AIR-1 Dust and Emissions Control Plan – Final IS/MND

## **Hazards and Hazardous Materials**

### ***Final IS/MND Analysis***

The Project area is not included on any list of hazardous materials sites (CDC 2011; DTSC 2018; SWRCB 2015). However, there are two ongoing leaking underground storage tank (LUST) cases within approximately 200 feet of the Project area. One case is located at 401 East St. Charles Street at the San Andreas Mini-Mart facility and the other is located at 632 West St. Charles Street at the former Calaveras Tool Rental facility (SWRCB 2015). There is also a former asbestos mine located approximately 2 miles west of the Project area (CDC 2011). Finally, there are two small quantity generators of hazardous waste located at 628 West St Charles and 180 California Street that are subject to RCRA and are within close proximity to the Project work corridor.

The Project area is approximately 200 feet southwest of Calaveras High School and 0.15 miles south of San Andreas Elementary School. There are no public airports within 2.0 miles of the Project area, but the

private heliport used by Mark Twain St. Joseph's Hospital is located approximately one-quarter mile east of the Project area.

The Project area falls within a Local Responsibility Area (LRA) and is not considered a very high fire severity zone

(Cal Fire 2009). However, the Project area was considered a high fire hazard severity zone in a draft version of the Cal Fire hazard severity map (Cal Fire 2007). Fire protection in this area is primarily provided by the San Andreas Fire Protection District (SAFPD). Emergency egress to and from the Project area would be provided by Highway 49 and Mountain Ranch Road.

### ***Updated Analysis***

Checklist topic 8 of the Final IS/MND analyzed impacts related to hazards and hazardous materials that would be associated with implementation of the project. The Final IS/MND identified no potentially significant impacts. Although temporary construction activities associated with the project would involve the transport and use of limited quantities of hazardous materials, the project contractor would handle all materials in accordance with applicable Federal, State, and local regulations for hazardous substances.

The asbestos cement piping is currently in a non-friable form and is not anticipated to become friable during removal; the Contractor will follow all current state and federal laws pertaining to asbestos removal and disposal and therefore impacts will be less than significant with mitigation incorporated. Construction of the updated project element would utilize similar construction techniques identified in the Final IS/MND; while the Final IS/MND specified 'naturally occurring' asbestos, any potential impacts from the discovery of asbestos pipes would be substantially similar to those described in the Final document and would not warrant additional analysis. Further, the regulation for naturally occurring asbestos is the same regulation (CCR Title 17 Section 9305) that applies to asbestos pipe in which activities in compliance with the regulations would not require additional mitigation. Therefore, no additional impacts or increase in the severity of hazardous waste impacts would occur with implementation of the updated project element. However, as the Final IS/MND did not specify the project's asbestos compliance measures in the Hazards and Hazardous Waste Checklist Topic analysis, the District feels it is prudent to implement an additional Mitigation Measure, HAZ-1, in this Addendum to ensure that all analysis is recorded. No new significant impacts would occur and one additional mitigation measure is required.

### ***Mitigation Measures***

HAZ-1 Asbestos Compliance Plan - The District shall require that the selected contractor follow all state and federal laws which pertain to Asbestos removal. Additionally, the contractor shall follow all procedures listed in Section 02 82 33 of the project Specifications 'Removal and Disposal of Materials Containing Asbestos' as well as provide an Asbestos Compliance Plan at least 21 days prior to starting construction activities. The District shall be responsible for ensuring that all asbestos control measures are implemented in a timely manner during all phases of Project development and construction by the contractor.

## **Conclusion/Determination**

In accordance with Section 15162 and 15164 of the State CEQA Guidelines, the District has determined that this Addendum to the Final IS/MND is necessary to document changes or additions that have occurred in the project description and information about the project site since the Final IS/MND was officially certified. The District has reviewed and considered the information contained in this Addendum and finds that the preparation of subsequent CEQA analysis that would require public circulation is not necessary, as the updates to the project would not introduce new significant environmental effects, substantially increase the severity of previously identified environmental effects, or demonstrate that mitigation measures or alternatives previously found not to be feasible would in fact be feasible. The updates would not alter the findings of the Final IS/MND; therefore, no further environmental review is required beyond this Addendum to the Final IS/MND.

## Tessa K. Marlow

---

**From:** Barnes, Jennifer <Jennifer.Barnes@stantec.com>  
**Sent:** Friday, June 14, 2019 4:50 PM  
**To:** Elizabeth R. Schlegel, P.E., DBIA  
**Cc:** Steve Sinnock; Kristy M. Chang, P.E.  
**Subject:** RE: SASD 35% plans for review for environmental/permit groups  
**Attachments:** pro\_co-4\_sasd\_collection\_system\_permit\_20190614.pdf

Hello Elizabeth,

Please find attached our revised [Scope for Updating the Permits on the SASD Collection System Project](#).

For CEQA please note:

Regarding the asbestos in the pipelines for SASD, the CEQA document has a discussion (and associated mitigation) for naturally occurring asbestos. While the document specified 'naturally occurring' asbestos any potential impacts resulting from discovery of asbestos pipes would be substantially similar to those described in the document and wouldn't warrant additional analysis. Further, the regulation for naturally occurring asbestos is the same regulation (CCR Title 17 Section 9305) that applies to asbestos pipe in which activities in compliance with the regulations would not require additional mitigation. Based on this coverage no additional impact analysis or mitigation is warranted. We recommend that SASD save this email or prepare a separate memo as file copy to document your review and decision making process on this issue.

Please let me know if this proposal meets with your approval and I can draft up a No Cost Change Order.

Thank you,

**Jennifer Barnes**

Phone: (530) 470-0515

Stantec



The content of this email is the confidential property of Stantec and should not be copied, modified, retransmitted, or used for any purpose except with Stantec's written authorization. If you are not the intended recipient, please delete all copies and notify us immediately.

 Please consider the environment before printing this email.